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U.S. Application No. 09/995,647 Art Unit 2194
Response to March 24, 2005 Office Action

REMARKS

In response to the Office Action dated March 24, 2005, the Assignee respectfully requests reconsideration based on the above claim amendments and the following remarks. The Assignee respectfully submits that the pending claims distinguish over the cited documents.

The United States Patent and Trademark Office (the "Office") rejected claims 1-13 under 35 U.S.C. § 112, second paragraph, for indefiniteness. Claim 13 was rejected under 35 U.S.C. § 102 (e) as being anticipated by U.S. Patent 6,665,662 to Kirkwood *et al.* Claims 1-12 and 14-38 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over Kirkwood in view of U.S. Patent 6,816,864 to Deuser *et al.* The Assignee shows, however, that the amended claims are neither obviated nor anticipated by the cited documents. The Assignee thus respectfully submits that the pending claims distinguish over the cited documents.

Use of "Oracle" in the Specification

The specification uses the term "Oracle" without proper designation as a trademark. The Assignee herein amends paragraphs [0013] and [0015] to recite the proper use of the trademark "ORACLE®."

Rejection of Claims under 35 U.S.C. § 112

Claims 1-13 were rejected under 35 U.S.C. § 112, second paragraph, for indefiniteness. Examiner Zhen objects to the use of the term "storage schema." Claims 1-12 have been amended to recite "database," and the rejection should be moot.

Rejection of Claim 13 under 35 U.S.C. § 102

Claim 13 was rejected under 35 U.S.C. § 102 (e) as being anticipated by U.S. Patent 6,665,662 to Kirkwood *et al.* A claim is anticipated only if each and every element is found in a

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single prior art reference. See *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q. 2d (BNA) 1051, 1053 (Fed. Cir. 1987). See also DEPARTMENT OF COMMERCE, MANUAL OF PATENT EXAMINING PROCEDURE, § 2131 (orig. 8th Edition) (hereinafter "M.P.E.P."). As the Assignee shows, the amended claims patentably distinguish over *Kirkwood*. The reference to *Kirkwood* does not anticipate the claims, so the Assignee respectfully requests that Examiner Zhen remove the 35 U.S.C. § 102 (e) rejection.

Claim 13 has been amended. Claim 13 recites stored manipulation rules. The manipulation rules comprise at least three hierarchically organized views, with each view utilizing an execution sequence of validation methods. Amended claim 13 is reproduced below.

13. (Currently Amended) A web server system comprising:

- a plurality of web browser applications;
- means for performing manipulation service on data submitted by said at least one of the web browser applications;
- means for processing web forms;
- means for storing and retrieving a plurality of manipulation rules for performing said manipulation service, the manipulation rules comprising at least three hierarchically organized views, with each view utilizing an execution sequence of manipulation functions; and
- means for compiling manipulation rules into said at least one web application in order to perform said manipulation service.

Independent claims 1, 23, 24, and 34 recite similar features.

The patent to *Kirkwood* does not anticipate the claims. *Kirkwood* is completely silent to "manipulation rules comprising at least three hierarchically organized views, with each view utilizing an execution sequence of validation methods." *Kirkwood* fails to teach or suggest "at least three hierarchically organized views" of manipulation rules. *Kirkwood* also fails to teach or suggest "each view utilizing an execution sequence of validation methods." *Kirkwood* does describe "documentation concepts" that can be arranged in hierarchies. See, e.g., U.S. Patent 6,665,662 to *Kirkwood et al.* (Dec. 16, 2003) at column 8, lines 28-31, lines 41-43, and lines 47-

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54; column 9, lines 7-60 (lines 53-56 in particular); and column 11, lines 50-65. *Kirkwood's* "documentation concepts," however, discusses hierarchies of relationships between products and services. No where does *Kirkwood* describe "manipulation rules comprising at least three hierarchically organized views." Moreover, *Kirkwood* also fails to teach or suggest "each view utilizing an execution sequence of validation methods." Because *Kirkwood* is silent to such features, the patent to *Kirkwood* cannot anticipate the claims. The Assignee, then, respectfully requests that Examiner Zhen remove the § 102 rejection.

Rejection of Claims 1-12 and 14-38 under 35 U.S.C. § 103 (a)

Claims 1-12 and 14-38 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over *Kirkwood* in view of U.S. Patent 6,816,864 to Deuser *et al.* If the Office wishes to establish a *prima facie* case of obviousness, three criteria must be met: 1) combining prior art requires "some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill"; 2) there must be a reasonable expectation of success; and 3) all the claimed limitations must be taught or suggested by the prior art. DEPARTMENT OF COMMERCE, MANUAL OF PATENT EXAMINING PROCEDURE, § 2143 (orig. 8th Edition) (hereinafter "M.P.E.P.").

Claims 1-12 and 14-38 are not obvious. Independent claims 1, 23, 24, and 34 recite the same distinguishing features as claim 13. Moreover, the dependent claims recite additional features that are not taught or suggested by the proposed combination of *Kirkwood* and *Deuser*. Claims 3, 5, and 6, for example, respectively recite "a highest priority view," "a second-highest priority view," and "generic functions." Claim 7 recites "long distance ordering," and claim 9 describes an "execution sequence" for the highest priority view. Claim 31 describes installation dates, available installation dates, and allowable number of telephones for long distance ordering. All the dependent claims, in fact, recite additional features not taught or suggested by the proposed combination of *Kirkwood* and *Deuser*. Because the proposed combination of *Kirkwood* and *Deuser* fails to teach or suggest these features, one of ordinary skill in the art would not

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consider these claims obvious over *Kirkwood* in view of *Deuser*. The Assignee thus respectfully requests that the § 103 rejection be removed.

If any questions arise, the Office is requested to contact the undersigned at (919) 387-6907 or scott@scottzimmerman.com.

Respectfully submitted,



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